

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER,
BRANDON PIYEVSKY, BENJAMIN SHUMATE,
BRITTANY TATIANA WEAVER, and
CAMERON WILLIAMS, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE UNIVERSITY
OF PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

**[PROPOSED] ORDER REGARDING PLAINTIFFS' MOTION TO COMPEL
AND FOR SANCTIONS AGAINST GEORGETOWN UNIVERSITY AND ITS
COUNSEL AND FOR RELATED RELIEF**

Pending before the Court is Plaintiffs' Motion To Compel And For Sanctions Against Georgetown University And Its Counsel And For Related Relief (ECF 412). Upon consideration of the said Motion and the Joint Status Report submitted by Plaintiffs and Georgetown on July 31, 2023, to resolve Plaintiffs' Motion to Compel and for Sanctions filed on July 31, 2023, the Court enters the following Order:

1. Georgetown shall conduct a reasonable search for any original [REDACTED]
[REDACTED]
[REDACTED] from the Admissions Office and President's Office files and produce them within 21 days of entry of this Order.
2. Georgetown shall conduct a reasonable search from the President's Office files, on a "go get" basis, for documents that describe the reasons a particular individual may be on the [REDACTED]," and shall produce those documents within 28 days of entry of this Order. If Georgetown does not believe it can meet that deadline, it shall file a motion to extend this deadline within 21 days of entry of this Order.
3. Georgetown shall conduct a reasonable search on a "go-get" basis from the Advancement Office files for documents that describe the reasons a particular individual may have been [REDACTED]
[REDACTED], and shall produce those documents within 28 days of entry of this Order. If Georgetown does not believe it can meet that deadline, it shall file a motion to extend this deadline within 21 days of entry of this Order.
4. Georgetown shall insert unique identifying numbers ("UIDs") over the applicant names in the documents identified pursuant to the above searches, regardless of

whether or not the document qualifies as a “donation record” under the Agreed Confidentiality Order (ECF No. 254), or an amendment thereto, to the extent such UUIDs are included in Georgetown’s structured data. Georgetown may otherwise redact any documents pursuant to FERPA and the Agreed Confidentiality Order (or any amendment thereto).

5. After the production of the above information, the parties shall meet and confer at Plaintiffs’ request in good faith to determine whether additional searches are appropriate, including targeted searches for information related to particular candidates identified in the above referenced productions.
6. The parties shall continue to meet and confer regarding a process that would allow Plaintiffs to question Georgetown witnesses about the names of particular candidates, but whose names in any particular documents are redacted under FERPA and the Agreed Confidentiality Order, or any amendment thereto. If the parties cannot come to an agreed upon process, they shall submit the dispute to the Court via joint status report due on August 15, 2023.

SO ORDERED:

Dated: _____

Hon. Matthew F. Kennelly

United States District Judge